

Morse, Bob

From: Battaglia, Randall W CIV USARMY CENAN (US) <Randy.W.Battaglia@usace.army.mil>
Sent: Wednesday, March 20, 2019 12:56 PM
To: Morse, Bob
Cc: Pocze, Doug; Vazquez, Julio
Subject: RE: Draft 2017 LTM Annual Report for SEAD-25

Yes, there were exceptions. I apologize, I will be more careful in my wording in the future.

The levels are low and not changing but not non-detected. We will continue monitoring. Without reviewing the exact language, I recall the ROD said after two five year reviews.

Again, it is not a high priority, and also it is a big effort for the ROD actions, etc. to achieve final concurrence and discontinuation of monitoring. The wells are needed for PFAS, so the site won't be closed out now anyway.

It's been hard enough getting responses from the attorney on the FOSTs. She does have many other actions. She's moving fast now. An additional action item for legal won't expedite the FOST and ECP reviews.

The LUC environmental easements, property transfers, and the OD Grounds ROD, remediation and transfer are the priorities.

Thanks

My primary office phone number is now: 347-213-1565

Randy Battaglia
Project Manager
Seneca AD BRAC Environmental Coordinator/Caretaker New York District CENAN-PP-E

-----Original Message-----

From: Morse, Bob [mailto:Morse.Bob@epa.gov]
Sent: Wednesday, March 20, 2019 12:18 PM
To: Battaglia, Randall W CIV USARMY CENAN (US) <Randy.W.Battaglia@usace.army.mil>
Cc: Pocze, Doug <Pocze.Doug@epa.gov>; Vazquez, Julio <Vazquez.Julio@epa.gov>
Subject: [Non-DoD Source] FW: Draft 2017 LTM Annual Report for SEAD-25

Randy,

Below is Julio's September 2018 email re the 2017 Report, along with his original attachment. I guess there were some exceptions to the halting of monitoring in the 2017 report, which he reiterated. I'm not sure what he meant by 5 Year Review decisions. We don't use Five Year Review decisions to memorialize such a request. We might concur on a such a request in commenting on the 5 yr review, but that doesn't finish things. Some other form of documentation and EPA concurrence is needed. Are there any other outstanding ROD requirements? That would affect the Army documentation needed and the format of EPA concurrence. What happens with PFAS might also affect things. I suggest checking with your attorneys at some point to determine the proper course of action to discontinue monitoring. I hope this helps.

Bob

From: Vazquez, Julio
Sent: Thursday, September 13, 2018 4:56 PM
To: Battaglia, Randall W CIV USARMY CENAN (US) <Randy.W.Battaglia@usace.army.mil>
Cc: Melissa Sweet (Melissa.Sweet@dec.ny.gov) <Melissa.Sweet@dec.ny.gov>; Sergott, Mark S (HEALTH) <mark.sergott@health.ny.gov>; Badik, Beth <Beth.Badik@parsons.com>; Belanger, Todd <Todd.Belanger@parsons.com>; Morse, Bob <Morse.Bob@epa.gov>
Subject: Draft 2017 LTM Annual Report for SEAD-25

Randy,

After review of the subject document dated June 2018, we concur that the levels of contamination have decreased significantly, and that the halting of the LTM sampling with the exceptions mentioned, i.e., emerging contaminants and 5 Year Review decisions, may be technically acceptable. However, the ROD language asks to "conduct groundwater monitoring of the plume for COCs until NYSDEC Class GA standards are achieved." In order to halt the groundwater monitoring for SEAD-25 as per the subject document recommendation, some type of administrative effort would be needed to change the ROD requirement.

Please find attached EPA guidance on documenting Post-ROD changes for your reference.

VR,

Julio F Vazquez

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